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VIA ELECTRONIC FILING AND HAND DELIVERY

Magalie Roman Salas, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Fourth Quarterly Report
CC Docket 94-102
Broadband PCS Station KNLF934, Bemidji, MN
Broadband PCS Station KNLG949, LaCrosse, WI
Broadband PCS Station KNLG950, Mankato, MN
Broadband PCS Station KNLG954, Rochester, MN
Broadband PCS Station KNLF485, Worthington, MN
Broadband PCS Station KNLG952, Watertown, SD
Broadband PCS Station KNLF368, Willmar, MN
Broadband PCS Station KNLG953, Worthington, MN
Broadband PCS Station KNLF389, Brainerd, MN
Broadband PCS Station KNLG955, Brainerd, MN
Broadband PCS Station KNLG951, Duluth, MN
Broadband PCS Station KNLG947, Eau Claire, WI
Broadband PCS Station KNLF641, Fargo, ND
Broadband PCS Station KNLF388, Fergus Falls, MN
Broadband PCS Station KNLG948, Fergus Falls, MN
Broadband PCS Station KNLF642, Grand Forks, ND
Transmission of E911 Calls from TTY Devices**

Dear Ms. Salas:

On behalf of Minnesota PCS Limited Partnership, we are submitting herewith its Third Quarterly Report in response to the Commission's *Fourth Report and Order* (CC Docket 94-

102), FCC 00-436, Released December 14, 2000. Pursuant to the Commission's instructions, we are also submitting this report through the Commission's Electronic Comment Filing System.

Please direct any questions or correspondence regarding this filing to our office.

Very truly yours,

A handwritten signature in black ink, appearing to read "Richard D. Rubino". The signature is fluid and cursive, with a prominent initial "R" and "D".

Richard D. Rubino
Attorney for Minnesota PCS Limited Partnership

cc: Chief, Policy Division, Wireless Telecommunications Bureau
Chief, Disabilities Rights Office, Consumer Information Bureau
Mindy Littell (via email)
Qualex International (via email)

MINNESOTA PCS LIMITED PARTNERSHIP
13810 24th Avenue North
Plymouth, Minnesota 55441-3601

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445 12th Street, SW
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Transmission of E911 Calls from TTY Devices

Fourth Quarterly Report

Dear Ms. Salas:

This report is filed pursuant to the directive contained in the Commission's *Fourth Report and Order*, (CC Docket 94-102), FCC 00-436, Released December 14, 2000 ("the *Fourth R&O*").¹

¹ In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, CC Docket 94-102, 15 FCC Rcd 25216 (December 28, 2000), ("*Fourth Report and Order*").

The Commission has requested that the reports contain the information specified in Paragraph No. 17 of the *Fourth R&O*, but allows the carriers to report in conjunction with the TTY Forum. See, *Fourth R&O*, ¶¶ 15-16. The information outlined in Paragraph No. 17 of the *Fourth R&O* is of a type that is not presently available to us, and is instead within the province of the equipment manufacturers and the TTY Forum. Therefore, Minnesota PCS Limited Partnership ("Minnesota PCS") hereby joins in the quarterly report being submitted by the TTY Forum.

Minnesota PCS is a small carrier serving small urban markets and rural areas. It lacks any influence over the research and development activities of equipment manufacturers, and will rely wholly upon its equipment manufacturers to install (on a turnkey basis) the equipment necessary to allow its PCS system to process E-911 calls originating from Text Telephone ("TTY") devices. As Minnesota PCS has advised the Commission in the past, it intends to obtain and install the equipment necessary for enhanced 911 services as soon as technically and economically feasible after it becomes available from equipment vendors.

Minnesota PCS remains committed to meeting the June 30, 2002 TTY implementation deadline, but despite its best efforts, will not be able to meet the December 31, 2001 deadline by which carriers operating digital systems must have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices. Minnesota PCS, to the extent necessary, requests that the Commission consider its TTY implementation report as a request for waiver of the December 31, 2001 requirement. It should be emphasized that the waiver is being requested out of an abundance of caution; and that, in any event, a waiver is not needed because the December 31, 2001 deadline does not appear in Section 20.18(c) of the Rules.

Respectfully submitted,

Minnesota PCS Limited Partnership

By: 
Officer, General Partner

Dated: December 28, 2001